

October 22, 2003

Ms. Marlene Dortch, Secretary
Federal Communications Commission
The Portals, 445 12th Street, S.W.
Washington, D.C. 20554
Attention: FCC's Docket No. 03-66

Re: University of South Florida
ITFS Stations WHF223, WHR943, WHR736, WHR820, WNC859, WNC860

The University of South Florida is classified as Doctoral/Research Extensive by the Carnegie Foundation for the Advancement of Teaching and is ranked among the top 100 public research universities in the annual report "The Top American Research Universities." USF serves 39,000 students among campuses located in Tampa, St. Petersburg, Sarasota/Manatee and Lakeland.

Home to the largest distance education program among Florida's public universities, USF serves 21,000 enrollments in more than 800 distance learning courses annually. Licensed for 20 ITFS frequencies, USF has delivered courses using this network for more than 15 years. Today, 100 courses are offered annually via ITFS.

Over the past several years, and in partnership with commercial wireless operators, USF has been involved with some exciting developments in ITFS technology, including opposite polarization of the same frequency and beta testing of 8:1 digital compression. These opportunities have supported increased access to USF programs. Also as a result of its partnerships with wireless operators, the University has been able to fund expansion into other delivery options and support faculty development initiatives focusing on the integration of technology into instructional models. These actions have resulted in a 63% increase in student enrollments since 1998. These same funding resources contributed to the University obtaining a five year, three million dollar federal award to advance the national research agenda on anytime/anyplace learning options.

As a result of this spectrum now capable of supporting digital two-way services, the University has explored the development of a shared network involving three K-12 school districts, two community colleges and a private university. This system could potentially support increased student access and foster collaborative program development supporting a seamless K-20 environment. Specific to USF, increasing opportunities for student access to broadband Internet service is the core strategy for ITFS over the next five years.

ITFS has been an essential element to the development of distance learning and continues to play a vital role in the advancement of technology and teaching at USF. Therefore, USF strongly advocates the Coalition Proposal as reflected in the comments and reply comments of the WCA/NIA/CTN and for the positions submitted separately by NIA/CTN, specifically their position on the need to maintain the educational eligibility requirements of ITFS licensees. These positions will lead to efficient and effective spectrum access by both education and commercial operators while ensuring this educational asset remains within the community it was designated to serve.

Respectfully Submitted,

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